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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

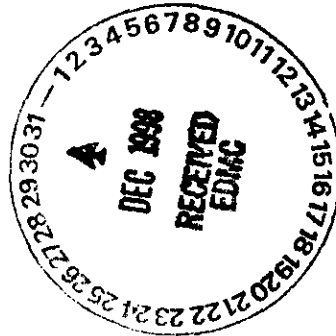
1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

July 2, 1998

Mr. James E. Rasmussen
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, WA 99352

Mr. Larry Olguin
Fluor Daniel Hanford Company
P.O. Box 1000, MSIN: N1-26
Richland, WA 99352

Mr. Fred R. Crawford
Babcock & Wilcox Hanford Company
P.O. Box 1700, MSIN: T5-50
Richland, WA 99352



Dear Messrs. Rasmussen, Olguin, and Crawford:

Re: January 28, 1998, Dangerous Waste Compliance Inspection at the Plutonium Finishing Plant

Thank you for the assistance of the U.S. Department of Energy (USDOE), Fluor Daniel Hanford Company (FDH), and Babcock & Wilcox Hanford Company (BWHC) personnel during the Washington State Department of Ecology's (Ecology) January 28, 1998, inspection of the Plutonium Finishing Plant (PFP). The inspection was conducted to assess waste management practices within the PFP complex including the status for completion of corrective measures four, five, and six of Ecology's September 16, 1997, notice of correction.

The following are items of concern from Ecology's January 28, 1998, inspection:

1. Unidentified liquids were observed inside the pulse hood in Plutonium Reclamation Facility's (PRF) miscellaneous treatment area.
2. Moisture and evidence of liquid intrusion were observed within gloveboxes in the PRF. The gloveboxes in the PRF canyon areas are contaminated with mixed waste and interconnected with process lines containing mixed waste.
3. The waste concentrator in the analytical laboratories contains mixed waste.

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4. Permitting of the 241-Z tank system has not been pursued. The 241-Z tank system is overdue for a tank integrity assessment.
5. The 361-Z tank system contains mixed waste.


USDOE's, FDH's, and BWHC's response to Ecology's September 16, 1997, notice of correction included a tabular listing titled "Designation of Solid Waste Items, Table 2." This table listed ten (10) items deemed by USDOE, FDH, and BWHC to be solid waste requiring designation per Washington Administrative Code (WAC) chapter 173-303. Although progress has been made in addressing these ten (10) items, Ecology's January 28th inspection revealed items of concern in addition to those listed in table 2. These items are listed above (items 1, 2, and 3) and will be added to the table 2 list for resolution within the context of Ecology's September 16, 1997, notice of correction. Please contact Mr. Steve Moore at (509) 736-3023 regarding resolution of these items.

The fourth concern from Ecology's January 28th inspection is the operating status of the 241-Z tank system. The tank system is expected to be used in support of long term clean-out operations for the PFP; however, permitting of the system has not been pursued. The 241-Z tank system requires current tank integrity assessments to meet interim status standards and must proceed with either closure or final status permitting immediately. Please contact Mr. Oliver Wang, Ecology's Z-Area project Manager, at (509) 736-3040 to pursue further operations and permitting of the 241-Z tank system.

The fifth concern documented during Ecology's January 28th inspection involves resolution of the safety questions and waste management issues pertaining to the 361-Z tank system. Ecology acknowledges USDOE's and BWHC's efforts to characterize the waste within the 361-Z tank and will monitor progress in resolving technical and regulatory issues associated with removing the waste from this tank system. Mr. Oliver Wang, Z-Area Project Manager, will be Ecology's point of contact for issues related to the 361-Z tank system.

Upon receipt of this letter please contact Mr. Steve Moore or Mr. Oliver Wang as indicated above to schedule resolution of the concerns described in this letter. If you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson, Compliance Inspector
Nuclear Waste Program

BW:sb
Enclosure

cc: Larry Romine, USDOE
Julie Robertson, BWHC
Steve Szendre, FDH
Mary Lou Blazek, ODOE
Administrative Record: Plutonium Finishing Plant / Plutonium Reclamation Facility